

From: [Spielmann, Lee](#)
To: ["Lyons, Francis"](#)
Subject: Growth Products
Date: Monday, October 19, 2020 5:41:00 PM

Frank,

I have discussed your offer to settle this matter for [REDACTED] with mid-level Region 2 management. They have informed me, and asked that I convey this to you, [REDACTED] that they are unable to accept that offer. Region 2 is willing to settle the matter for the previously tendered amount, [REDACTED].

The [REDACTED] settlement amount represents settlement [REDACTED]. Accordingly, the Region believes this amount represents an equitable settlement amount. Were EPA to factor in [REDACTED], we believe the [REDACTED].

For that reason, EPA does not believe it appropriate to settle for the amount you have offered. Please let me know whether your client will accept the [REDACTED] offer.

Thank you, Frank.

Regards,

Lee